



State of Utah
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF SOLID AND HAZARDOUS WASTE

m/41/008

Michael O. Leavitt
Governor

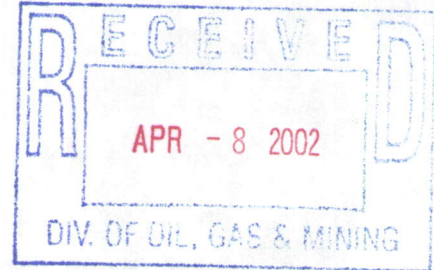
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April 3, 2002

Mr. Clay Shumway, Quarry/Mill Manager
United States Gypsum Company
P.O. Box 570160
Sigurd, UT 84657



Subject: Revised USG Renewal Application for Jumbo Class IIIb Solid Waste Landfill,
Permit #9418

Dear Mr. Shumway:

Thank you for the revised renewal application for your Class IIIb solid waste landfill permit. Many improvements were made in the application. Some of the comments in the Division's June 8, 2000 letter, Revised USG Renewal Application for Jumbo Class IIIb Solid Waste Landfill, Permit #9418 were satisfactorily addressed. However, some of them need additional work. They are noted in the comments in paragraph 1. Review of the subject renewal application received on January 22, 2002, has resulted in the comments in paragraph 2.

1. Comments Resulting from the review of U.S. Gypsum's responses to DSHW's June 8, 2000 letter.
 - a. "When you submit your revised application, please submit a copy of the document on a 3-1/2 inch floppy computer disk using Word Perfect, Corel, or Word format. This will reduce the cost of preparing the permit."
 - b. Please provide proof of ownership such as a deed. If the property is leased (from a private party or the BLM) please provide a copy of the lease or other instrument.
 - c. Provide a detailed plan of operation for the topics in R315 that are applicable to your Class IIIb landfill, including a description of on-site waste handling procedures, i.e., tell how you operate the landfill [R315-302-2(2)(b)]. See paragraph 2.e and 2.m below.
2. Comments Resulting from the review of Permit Application Revision # 2.

- a. Please fill in all blanks of Sections 7 and 8 of Part I - General Information.
- b. In Paragraph A-5-1 it should be noted that the gate is to be locked when the landfill is not in use.
- c. In Paragraph B-6-1 please explain how the specified equipment will help control explosive gases.
- d. Paragraph B-7-1. Will the Sigurd Volunteer Fire Department go to your landfill to help control dust or only fight fire? Please clarify.
- e. The various paragraphs of Section B address many of the requirements of the plant's landfill operations, but they do not address loading, transporting, and dumping of the waste. Nor does it address the routine covering of the landfill.
- f. Paragraph B-9-1. Please provide evidence of the training of U. S. Gypsum employees regarding identification of items containing PCBs.
- g. Paragraph B-11-1. Can White Sanitation dispose of **all** gypsum related wastes in addition to the other waste that the firm receives from U.S. Gypsum that are generated at the Sigurd facility, if the landfill was closed or inoperable? If that firm cannot handle all wastes at the quantities generated by U.S. Gypsum, please provide other options for plant disposal of all wastes [R315-302-2(2)(k)].
- h. Paragraphs C-1 and C-2 refer to Appendix E. Please designate on the Typical Cross section A-A the difference between solid lines and dashed lines. In addition on the cross section, please indicate the borrow and fill areas.
- i. Paragraph D-1-1. Please indicate what kinds of seeds will be planted, i.e., will seeds of the natural variety be planted? Indicate details of how the seeds will be planted. Because of the potential for erosion of the final cover, natural revegetation is not acceptable. Also, this paragraph describes two feet of soil cover. Appendix M indicates 18 inches of cover. Also, Paragraph E-2-1 indicates "1 foot of soil with 6 inches of indigenous topsoil." Please correct these differences [see R315-304-5(2)(b)].
- j. Paragraph D-2 does not have an associated D-2-1 paragraph describing run-on and run-off control systems. Please correct.
- k. Paragraph F-2-1 does not address the issue of Notification of Closure on the title or deed to the property [R315-310-4(2)(e)(v)]. This would apply even if the property is owned by the BLM.

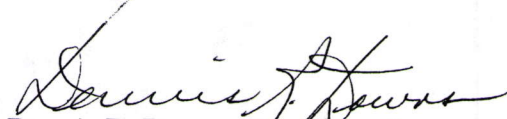
April 3, 2002

Page 3

- l. There is no Paragraph F-3-1 to address maintenance of the cover and the control of run-on and run-off. See R315-310-4(2)(e)(iii). Please correct.
- m. Paragraph B-9-1 indicates that the waste is inspected before it goes to the landfill, but it doesn't address the loading, transport, dumping, spreading, or covering of the waste.
- n. There are no response paragraphs for paragraphs G-1, G-2, and G -3. Please address Financial Assurance in significant detail as required by R315-310-3(1)(j), R315-310-4(2)(d)(iv), and R315-310-4(2)(e)(iv) plus R315-309. Including a copy of the proposed funding instrument will help clarify this issue.
- o. For Appendix G, please replace this sheet with an applicable sheet for landfill inspections. In this regard, please include parameters associated with the operation of the landfill, i.e., run on and run off control features, erosion of cover, **etc.** This is not a complete list of parameters that should be included in the inspection.

You may contact Ralph Bohn or Jerry Parkin at (801) 538-6170 to discuss the above issues and other topics related to this letter.

Sincerely,



Dennis R. Downs, Executive Secretary
Utah Solid and Hazardous Waste Control Board

DRD/JLP/kk

- c: Robert Resendes, M.B.A., M.T., Health Officer/Dept. Dir, Central Utah Health Dept.
Roger Foisy, DEQ Central Utah District Engineer
Lynn Kunzler, DOGM